

CITY OF HOUSTON



**PUBLIC WORKS AND
ENGINEERING**
PLANNING & DEVELOPMENT
DIVISION

Application for Approval of Municipal Setting Designation

APPLICANT INFORMATION

Applicant's Name: Fondren Road Plaza, Ltd.

☐ Individual ☐ Private Entity ☐ Public Entity ☐ Non-Profit Entity ☐ Other

Address: 3800 Southwest Freeway, Suite 304 Houston Texas 77027
(Street) (City) (State) (Zip)

Phone No.: 281-530-0900 Fax No.: 281-530-0690

Email: _____

Contact Information

Name of Contact: Gary Ferguson

Title: _____

Address: 3800 Southwest Freeway, Suite 304 Houston Texas 77027
(Street) (City) (State) (Zip)

Phone No.: 281-530-0900 Fax No.: 281-530-0690

Email: _____

SITE INFORMATION

Site Name: Fondren Road Plaza

Site Size: 7.57 acres

Site Address: 7042 Bissonnet, Houston, Harris County, Texas 77074

(List all owners -- additional sheet is attached, if needed)

Owner: Fondren Road Plaza, Ltd.

Owner Address: 3800 Southwest Freeway, Suite 304 Houston Texas 77027
(Street) (City) (State) (Zip)

Name of Contact: Gary K. Ferguson

Title: _____

Organization: Fondren Road Plaza, Ltd.

Phone No.: 281-530-0900 Fax No.: 281-530-0690

Email: _____

Additional Owner List

(Cont'd from pg. 1)

Owner: _____

Owner Address: _____
(Street) (City) (State) (Zip)

Name of Contact: _____

Title: _____

Organization: _____

Phone No.: _____ Fax No.: _____

Email: _____

Owner: _____

Owner Address: _____
(Street) (City) (State) (Zip)

Name of Contact: _____

Title: _____

Organization: _____

Phone No.: _____ Fax No.: _____

Email: _____

Owner: _____

Owner Address: _____
(Street) (City) (State) (Zip)

Name of Contact: _____

Title: _____

Organization: _____

Phone No.: _____ Fax No.: _____

Email: _____

Owner: _____

Owner Address: _____
(Street) (City) (State) (Zip)

Name of Contact: _____

Title: _____

Organization: _____

Phone No.: _____ Fax No.: _____

Email: _____

| ITEM | YES | NO | N/A | COH Use Only |
|---|-----|----|-----|--------------|
| **Executive Summary (Use Sheet Attached) | √ | | | |
| 1. Provide a legal description of the boundaries of the designated property and a copy of the deed for the designated property. <u>Label "Appendix A" - Cross Reference with TCEQ's # 3</u> | √ | | | |
| 2. A site map showing: a. The location of the designated property. b. The topography of the designated property as indicated on publicly available sources, which must note the watershed and whether the designated property is located in a floodplain or floodway, as those terms are defined in Chapter 19 of the Code. c. The detected area of groundwater contamination. d. The location of all soil sampling locations and all groundwater monitoring wells. e. Groundwater gradients, to the extent known, and direction of groundwater flow. f. The ingestion protective concentration level exceedence zone for each contaminant of concern, to the extent known. <u>Label "Appendix B" - Cross Reference with TCEQ's # 1, 2 & 4</u> | √ | | | |
| 3. A description of the current use, and, to the extent known, the anticipated uses, of the designated property and properties within 500 feet of the boundary of the designated property. <u>Label "Appendix C"</u> | √ | | | |
| 4. For each contaminant of concern within the ingestion protective concentration level exceedence zone, to the extent known, provide the following: a. A description of the ingestion protective concentration level exceedence zone and the non-ingestion protective concentration level exceedence zone, including a specification of the horizontal area and the minimum and maximum depth below ground surface. b. The level of contamination, the ingestion protective concentration level, and the non-ingestion protective concentration level, all expressed as mg/L units. c. Its basic geochemical properties (e.g., whether the contaminant of concern migrates with groundwater, floats or is soluble in water). <u>Label "Appendix D" - Cross Reference with TCEQ's # 5</u> | √ | | | |
| 5. For each contaminant of concern within the designated groundwater, to the extent known: a. A description of the ingestion protective concentration level exceedence zone and the non-ingestion protective concentration level exceedence zone, including a specification of the horizontal area and the minimum and maximum depth below ground surface. b. The level of contamination, the ingestion protective concentration level, and the non-ingestion protective concentration level, all expressed as mg/L units. c. Its basic geochemical properties (e.g., whether the contaminant of concern migrates with groundwater, floats or is soluble in water). <u>Label "Appendix E" - Cross Reference with TCEQ's # 5</u> | √ | | | |

| ITEM | YES | NO | N/A | COH Use Only |
|--|-----|----|-----|--------------|
| <p>6. A table displaying the following information for each contaminant of concern, to the extent known:</p> <p>a. The maximum concentration level for soil and groundwater, the ingestion protective concentration level, and the non-ingestion protective concentration level, all expressed as mg/L units.</p> <p>b. The critical protective concentration level without the municipal setting designation, highlighting any exceedences.</p> <p><u>Label "Appendix F" - Cross Reference with TCEQ's # 5</u></p> | √ | | | |
| <p>7. A statement as to whether the plume of contamination is stable, expanding, or contracting, with the basis for that statement. If this information is not known, a statement of why the information is not known should be attached.</p> <p><u>Label "Appendix G"</u></p> | √ | | | |
| <p>8. A statement as to whether contamination on and off the designated property without a municipal setting designation <u>exceeds</u> a residential assessment level as defined in the Texas Risk Reduction Program or analogous residential level set by EPA, if known, and the basis for that statement.</p> <p><u>Label "Appendix H"</u></p> | √ | | | |
| <p>9. A statement as to whether contamination on and off the designated property with a municipal setting designation <u>will exceed</u> a residential assessment level as defined in the Texas Risk Reduction Program or analogous residential level set by EPA, if known, and the basis for that statement.</p> <p><u>Label "Appendix I"</u></p> | √ | | | |
| <p>10. Identification of the points of origin of the contamination and the persons responsible for the contamination, to the extent known.</p> <p><u>Label "Appendix J"</u></p> | √ | | | |
| <p>11. A description of any environmental regulatory actions that have been taken within the past five years in connection with the designated property, to the extent known.</p> <p><u>Label "Appendix K"</u></p> | | | √ | |
| <p>12. A listing of all existing state or EPA registrations, permits, and identification numbers that applies to the designated property.</p> <p><u>Label "Appendix L"</u></p> | √ | | | |
| <p>13. A statement as to whether the designated property has been admitted to the Texas Voluntary Cleanup Program (section 361.601 of the Texas Health & Safety Code, as may be amended from time to time) or similar state or federal programs, and a description of the status of the designated property in the program.</p> <p><u>Label "Appendix M"</u></p> | √ | | | |

| ITEM | YES | NO | N/A | COH Use Only |
|---|-----|----|-----|--------------|
| 14. A summary of any environmental site assessment reports filed with TCEQ regarding any site investigations or response actions that are planned, ongoing or completed related to the designated property. <u>Label "Appendix N"</u> | √ | | | |
| 15. A statement as to whether any public drinking water supply system exists that satisfies the requirements of Chapter 341 of the Texas Health and Safety Code and that supplies or is capable of supplying drinking water to the designated property and property within one-half mile of the designated property and the identity of each supply system. <u>Label "Appendix O" - Cross Reference with TCEQ's # 2. 1st bullet</u> | √ | | | |
| 16. The name and address of each owner or operator of a water well registered or permitted by the state or the Houston-Galveston Subsidence District that is located within five miles of the boundary of the designated property, along with: a. A map showing the location of each well and, to the extent known, a notation of whether each well is used for potable water. b. A statement as to whether the applicant has provided notice to each owner in compliance with section 361.805 of the Texas Health and Safety Code. <u>Label "Appendix P" - Cross Reference with TCEQ's # 8 & 9</u> | √ | | | |
| 17. The name and address of each retail public utility, as defined in section 13.002 of the Texas Water Code, that owns or operates a groundwater supply well within five miles of the boundary of the designated property, along with a statement as to whether the applicant has provided notice as required by section 361.805 of the Texas Health and Safety Code. <u>Label "Appendix Q" - Cross Reference with TCEQ's # 7, 3rd bullet</u> | √ | | | |
| 18. A listing of each municipality, other than the city of Houston, with a corporate limit within one-half mile of the boundary of the designated property, and a statement as to whether the applicant has provided notice as required by section 361.805 of the Texas Health and Safety Code. <u>Label "Appendix R" - Cross Reference with TCEQ's # 7, 2nd bullet</u> | √ | | | |
| 19. A listing of each municipality, other than the city of Houston, that owns or operates a groundwater supply well within five miles of the boundary of the designated property, and a statement as to whether the applicant has provided notice as required by section 361.805 of the Texas Health and Safety Code. <u>Label "Appendix S" - Cross Reference with TCEQ's # 7, 4th bullet</u> | √ | | | |
| 20. A listing of owners of real property within 2,500 ft. of the boundary of the designated property as indicated by the most recent appraisal district records. (Include pre-printed mailing labels) <u>Label "Appendix T"</u> | √ | | | |

| ITEM | YES | NO | N/A | COH Use Only |
|--|-----|----|-----|--------------|
| <p>21. The following statement signed and sealed by a licensed professional engineer or licensed professional geoscientist authorized to practice in the State of Texas with expertise in environmental remediation:</p> <p>'To the best of my knowledge and belief, based upon a review of all public and private records and other information sources available to me in the exercise of due diligence, the opinions stated and conclusions made in this application are supported by such information, and the technical and scientific information submitted with the application is true, accurate and complete. Based on such review, the contaminants of concern from sources on the designated property or migrating from or through the designated property more likely than not do exceed or do not exceed a non-ingestion protective concentration level on property beyond the boundaries of the designated property'</p> <p><u>Label "Appendix U"</u></p> | √ | | | |
| <p>22. If the licensed professional engineer or licensed professional geoscientist determines that contaminants of concern from sources on the designated property are migrating from or through the designated property more likely than not do exceed a non-ingestion protective concentration level on property beyond the boundary of the designated property, then the applicant must:</p> <ol style="list-style-type: none"> Specify the name and address of the owner of each property. Send a copy of the application to the owner of the property with the notice of the public meeting. Provide documentation that the designated property has been included in a state or federal program that requires that the entire non-ingestion protective concentration level exceedance zone be addressed to the satisfaction of the agency administering the program, along with documentation of the estimated time period in which it is to be addressed. An example of such a program is the Texas Voluntary Cleanup Program (section 361.501 of the Texas Health and Safety Code, as may be amended from time to time). Provide documentation upon completion of the state or federal program showing that the non-ingestion protective concentration level exceedances have been addressed to the satisfaction of the agency administering the program. <p><u>Label "Appendix V"</u></p> | | | √ | |
| <p>23. The following statement certified by the applicant and any authorized representatives of the applicant(s) listed in the application:</p> <p>'I certify under penalty of law that this application and all attachments were prepared under my direction or supervision in a manner designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the persons responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the</p> | √ | | | |

| | | | | |
|--|---|--|---|--|
| possibility of a fine and imprisonment for knowing violation'. <u>Label "Appendix W"</u> | | | | |
| 24. A copy of the TCEQ application, if it has been filed, excluding attachments. <u>Label "Appendix X"</u> | √ | | | |
| 25. The signature of the applicant and proof that the applicant has the legal authority to restrict the use of the groundwater on the designated property. <u>Label "Appendix Y"</u> | √ | | | |
| 26. The initial filing fee of \$2,000.00 payable to "City of Houston". <u>Label "Appendix Z"</u> | √ | | | |
| 27. Any additional information. <u>Label "Appendix AA"</u> | | | √ | |

CITY OF HOUSTON



**PUBLIC WORKS AND
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EXECUTIVE SUMMARY

Project Overview

InControl Technologies, Inc was retained by Fondren Road Plaza, Ltd. (the property owner), to provide environmental consulting services at Dry Clean, Etc. located at 7042 Bissonnet in Houston, Texas. The subject property (site) consists of approximately 7.57 acres of land located southwest of downtown Houston, Harris County, Texas. The subject property is developed with a multi-tenant commercial complex which is occupied by various businesses including a dry cleaner. Approximately 60% of the subject property is covered with the aforementioned building. Approximately 35% of the subject property is covered with concrete and brick access drives and walkways, while an estimated 5% of the subject property is covered with decorative landscaping.

Historical Environmental Condition

Historic dry cleaning operations in the Dry Clean, Etc. tenant space have resulted in chlorinated solvent impacts to soil and shallow groundwater. Tetrachloroethene (PCE) and its breakdown products (trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE), 1,1-dichloroethene (1,1-DCE) and vinyl chloride (VC)). The property to the adjacent south is an occupied condominium complex (Bimini Isle Condominiums). To the north of the subject property is a residential development. Properties adjacent east and west are commercial.

Dry Clean, Etc. was entered in to the TCEQ Voluntary Cleanup Program (VCP) in 2001 and was assigned VCP No. 1395. Malcolm Pimie conducted soil source area response activities including the removal of soil impacted with volatile organic compounds (VOCs) and the construction of infiltration galleries beneath the onsite dry cleaner tenant space. Two chemical oxidation events were conducted by Malcolm Pimie to address VOCs in the shallow groundwater unit. In November and December 2004, IRC conducted additional soil source area investigation activities. The results of these delineation activities indicated the impacted soils remained onsite. IRC conducted additional soil source area response action in February 2005. IRC conducted bi-monthly injections of potassium permanganate into the infiltration gallery during this time.

Seven groundwater monitoring wells (MW-1 through MW-7) were installed in 2000. Two additional wells (MW-8 and MW-9) were installed in the first quarter 2001 followed by seven more groundwater monitoring wells (MW-10 through MW-16) in the second quarter of 2001. Several of these wells were installed on the off-site property south of Bissonnet. In September 2002, one groundwater well (MW-3D) was installed on the onsite property and completed in a deeper groundwater zone. During the same time, groundwater monitor wells MW-7R, MW-10R and MW-17 through MW-20 were installed. Groundwater monitor wells MW-21, MW-22 and MW-23 were

InControl Technologies, Inc.

installed at the end of 2004. To further delineate the dissolved phase plume, four groundwater monitor wells (MW-24 through MW-27) were installed in April 2004. In late 2004, IRC installed an additional down-gradient monitor well (MW-28) to delineate the downgradient edge of the dissolved phase plume. In March 2004 InControl Technologies replaced groundwater monitoring well MW-9 with MW-9R.

Quarterly groundwater sampling was conducted by InControl Technologies in September and November 2006, February, May and August 2007. All groundwater samples collected from the permanent groundwater monitoring wells were analyzed for VOCs by EPA Method 8260B.

The analytical results from each sampling event were compared to the TCEQ Texas Risk Reduction Program (TRRP) Protective Concentration Levels (PCLs).

A review of the most recent groundwater sampling data (August 2007) indicates that the only COCs that currently exceed the most conservative TRRP Tier 1 ^{GW}GW_{Ing} PCLs are PCE, TCE, cis-1,2-DCE, 1,1-DCE and VC. The most recent groundwater sampling data also indicates that the PCL exceedence (PCLE) zone extends off-site in the downgradient direction across the adjacent property to the south (Bimini Isle Condominiums). The most recent soil samples collected on the subject property were also reported to contain PCE, TCE, cis-1,2-DCE and/or VC concentrations in excess of the most conservative TRRP Tier 1 ^{GW}Soil_{Ing} PCLs.

Item 1 – Legal Property Description

A copy of the legal description plus a metes and bounds description of the designated property is included in **Appendix A**.

Item 2 – Site Maps

The figures set out in this section provide information required under **Item 2**. The maps depict the property location and topography, the area of groundwater contamination, the location of all soil sampling points and groundwater monitoring wells, the groundwater gradient, and the ingestion groundwater PCL exceedance zone.

The subject property is located within the 100-year flood plain (AE) and within the Brays Bayou watershed.

The following is a listing of figures found in **Appendix B**.

Figure 2.1 – Site location Map

Figure 2.2a – Topographic Map

Figure 2.2b – Watershed Map

Figure 2.2c – Floodplain Map

Figure 2.3 – Groundwater PCLE zone

Figure 2.4a – Soil sampling locations

Figure 2.4b – Groundwater sampling locations

Figure 2.5 – Groundwater Gradient Map (August 2007)

Figure 2.6a – Soil PCL exceedance zone map

Figure 2.6b – Groundwater PCL exceedance zone maps (PCE, TCE, 1,1-DCE, cis-1,2-DCE, trans-1,2-DCE, VC)

Item 3 – Property Use

The subject property (site) consists of approximately 7.57 acres of land located southwest of downtown Houston, Harris County, Texas (**Figure 3.1**). The affected property is located in a mixed use retail commercial and residential area located southwest of downtown Houston. The property owner, Fondren Road Plaza, Ltd., developed the subject property in 1981 with the existing commercial complex. The 7.57-acre subject property is currently developed with a multi-tenant commercial complex.

Approximately 95% of the subject property is covered with parking spaces, walkways and retail shops (**Figure 3.1**). The remaining 5% is covered with decorative landscaped areas. Future use of the subject property is anticipated to remain retail commercial.

Figure 3.1 (found in **Appendix C**) provides a description of the surrounding land use within 500-feet of the site. The following is a general description of the surrounding land use.

- North - The subject property is bounded to the north by a Harris County Flood Control District drainage easement followed by a residential development.

- East - The subject property is bounded to the east by a Harris County Flood Control District drainage easement followed by commercial development.
- South – The subject property is bounded to the south by the Bissonnet Road right-of-way followed by Bimini Isle Condominiums.
- West – The subject property is bounded to the west by the Fondren Road right-of-way followed by commercial and residential developments.

Item 4 – PCLE Zone Discussion

A) A review of recent groundwater sampling indicates that the only COCs that currently exceed the conservative TRRP Tier 1 residential $^{GW}GW_{ing}$ PCLs are tetrachloroethene (PCE), trichloroethene (TCE), 1,1-dichloroethene (1,1-DCE), cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE) and vinyl chloride (VC). These PCL exceedences extend across the subject property and off-site in the downgradient direction. The southern portion of the PCLE exceedence zone extends beneath the Bimini Isle Condominiums. COC concentrations in excess of the conservative TRRP Tier 1 PCLs were not detected in the on-site upgradient perimeter wells (MW-1 and MW-4). Monitor wells located on the Bimini Isle Condominium property (MW-13, MW-14 and MW-26) indicate the groundwater PCLE zone extends onto the Bimini Isle Condominium property. Monitor wells MW-16, MW-15, MW-21 and MW-25 located along the southern property boundary of Bimini Isle Condominiums define the downgradient edge of the dissolved phase chlorinated solvent plume. The western edge of the dissolved phase chlorinated solvent plume is defined by monitor wells MW-17, MW-6, MW-11, MW-10, MW-10R and MW-16. The lateral extent of chlorinated hydrocarbons in groundwater is delineated in all directions (**Figure 2.3**).

The aerial extent of chlorinated hydrocarbons in groundwater is confined to the shallow groundwater unit. Groundwater samples collected from the groundwater monitoring well completed in the lower groundwater unit (MW-3D) has historically reported COC concentrations below the laboratory detection limit. Therefore, the ingestion PCLE zone is limited to the shallow groundwater unit across the subject property.

Based on a review of boring logs, the shallow groundwater on the subject property is first encountered at a depth of approximately 18-20 feet below ground surface (ft-bgs). The bottom of the shallow groundwater-bearing unit is estimated at approximately 25 ft-bgs.

A comparison of the recent groundwater sampling results with applicable non-ingestion protective concentration levels ($^{Air}GW_{inh-v}$) indicates that the concentration of PCE, TCE and cis-1,2-DCE in groundwater samples collected from MW-5, MW-13 and MW-20 and VC in the groundwater sample collected from MW-20 exceed the $^{GW}GW_{ing}$ PCL are below the $^{Air}GW_{inh-v}$ PCL. Therefore, based on the recent groundwater monitoring results, there is no indication that there is a non-ingestion protective concentration level exceedence zone on the subject property.

B) The following table represents the groundwater ingestion PCL exceedences that were reported from the August 2007 monitoring event:

Table 4.1 – Groundwater ingestion PCL Exceedences

| | TRRP PCL | PCE (mg/L) | TCE (mg/L) | 1,1-DCE (mg/L) | Cis-1,2-DCE (mg/L) | Trans-1,2-DCE (mg/L) | VC (mg/L) |
|-----------------------|------------------------------------|----------------------|---------------|-------------------|-----------------------|-------------------------|--------------|
| | ^{GW} GW _{Ing} | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| | ^{Air} GW _{Inh-V} | 330 | 160 | 980 | 10,000 | 10,000 | 3.6 |
| Monitoring Well ID | Sample Date | Concentration (mg/L) | | | | | |
| MW-5 | 8/21/07 | 6.1 | 1.4 | 0.033 J | 13.0 | 0.032 J | 1.0 |
| MW-7 | 8/21/07 | 0.046 | 0.046 | <0.0006 | 0.015 | <0.0006 | <0.0006 |
| MW-13 | 8/21/07 | 0.011 | 0.0087 | <0.0006 | 0.00023 J | <0.0006 | <0.0006 |
| MW-14 | 8/22/07 | 0.022 | 0.0074 | <0.0006 | 0.0057 | <0.0006 | <0.0006 |
| MW-18 | 8/21/07 | 0.013 | 0.024 | 0.002 J | 0.55 | 0.0018 J | 0.21 |
| MW-20 | 8/21/07 | 16 | 7.5 | 0.081 | 44 | 0.370 | 2.7 |
| MW-24 | 8/22/07 | 0.065 | 0.017 | <0.0006 | 0.043 | 0.0018 J | 0.0014 J |
| MW-26 | 8/22/07 | 0.0076 | 0.0015 J | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| MW-27 | 8/21/07 | 0.4 | 0.14 | <0.0006 | 0.6 | 0.0056 | 0.021 |

Notes – Values in **Bold** exceed the ^{GW}GW_{Ing} PCL (ingestion PCLE)

J- Result is above the laboratory detection limit, but below the laboratory reporting limit.

Groundwater COC concentrations tabulated above are less than the ^{Air}GW_{Inh-V} non-ingestion PCL, therefore there is no non-ingestion PCLE zone based on the August 2007 monitoring data.

C) The chlorinated solvents (tetrachloroethene, trichloroethene, 1,1-dichloroethene, cis-1,2-dichloroethene and vinyl chloride) detected in groundwater samples are associated with the historical dry cleaning operations in the Dry Clean, Etc. tenant space.

Chlorinated solvents are characterized by their high volatilities, high densities, low viscosities, low interfacial tension, low absolute solubilities, high relative solubilities, low partitioning to soil materials and low degradabilities. Chlorinated solvents will dissolve in water at low concentrations but once the groundwater has reached the saturation limit for that compound, the chlorinated solvent will form a separate phase in equilibrium with the water. Because chlorinated solvents have higher densities relative to water, the separate phase will “sink”. These compounds are referred to as “dense non-aqueous phase liquids” (DNAPLs). In high concentrations DNAPLs will be able to penetrate the water table and form “pools” on the top of less permeable layers. Historically, DNAPL has not been identified in any of the monitor wells within the groundwater monitor well network.

The rate of flow of a DNAPL through a geologic medium is dependent on the density and viscosity of the DNAPL, the pressure driving the DNAPL, the intrinsic permeability of the geologic medium and the degree of

DNAPL saturation of the pore spaces of the medium. Dissolved phase chlorinated solvents will move with groundwater flow. Chlorinated solvents will weakly bind to soil and rock meaning that sorption to soils will not significantly retard the movement of a chlorinated solvent.

Based on the field observations and laboratory results, it appears that the groundwater contaminants on the subject property are primarily dissolved in the shallow groundwater. The groundwater monitor well installed into the lower groundwater bearing unit (MW-3D) has historically reported VOC concentrations below the laboratory detection limit. This well is located near the center of the dissolved phase plume. Based on a review of the off-site groundwater sampling results, it appears that the dissolved phase COCs have migrated off-site in the downgradient direction.

Item 5 – COCs in Designated Groundwater Discussion

- A) Refer to **Item 4** for a discussion of the contaminants of concern (COC) in the ingestion protective concentration level (PCL) exceedence zone. Current groundwater sampling results indicate that there are six identified COCs (PCE, TCE, 1,1-DCE, cis-1,2-DCE, trans-1,2-DCE and VC) that exceed the ingestion protective concentration levels on the subject property. The groundwater samples collected from monitoring wells on the property to the adjacent south of the subject property were also reported to contain COCs in excess of the ingestion PCLs.
- B) Refer to **Table 4.1** for a tabulated comparison of COC concentrations with the respective TRRP Protective Concentration Levels (PCLs)
- C) Refer to **Item 4** for a discussion of the basic geochemical properties of the contaminants of concern (COCs) in the ingestion PCL exceedence zone.

Item 6 – Summary of Soil and Groundwater Concentration Data

The following tables summarize the concentration levels for the primary chemicals of concern in soil and groundwater. The tables include the concentration level, the ingestion protective concentration limits ($^{GW}Soil_{Ing}$ for soil and $^{GW}GW_{Ing}$ for groundwater), the non-ingestion protective concentration limits for soil ($^{Tot}Soil_{Comb}$ and $^{Air}Soil_{Inh-V}$) and groundwater ($^{Air}GW_{Inh-V}$), the critical protective concentration limits assuming no MSD is in place ($^{GW}Soil_{Ing}$ for soil and $^{GW}GW_{Ing}$ for groundwater), and the critical PCLs assuming that an MSD is in place ($^{Tot}Soil_{Comb}$ for soil and $^{Air}GW_{Inh-V}$ for groundwater).

Table 6.1 – Summary of Soil Sampling Results

| Chemicals of Concern (CAS) | | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|--------------|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} Soil _{ing} PCL without MSD | | 0.05 | 0.03 | 0.05 | 0.25 | 0.49 | 0.02 |
| Tier 1 ^{Total} Soil _{Comb} Critical PCL with MSD | | 98 | 150 | 1,800 | 770 | 1,400 | 3.7 |
| Tier 1 ^{Air} Soil _{Inh-V} Critical PCL | | 620 | 210 | 3,100 | 12,000 | 12,000 | 41 |
| Sample ID | Sample Depth | Date | (mg/kg) | (mg/kg) | (mg/kg) | (mg/kg) | (mg/kg) |
| MW-20 | 14-16 | 12/19/2001 | 2.8 | 0.16 | <0.005 | 2.6 | 0.13 |
| | 16-18 | 12/19/2001 | 1.86 | 0.06 | <0.005 | 1.31 | <0.01 |
| SB-1 | 8-10 | 12/19/2001 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| | 16-18 | 12/19/2001 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| SB-2 | 2-4 | 12/19/2001 | 0.007 | <0.005 | <0.005 | 0.102 | <0.01 |
| | 16-18 | 12/19/2001 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| SB-3 | 4-6 | 12/19/2001 | 0.006 | <0.005 | <0.005 | <0.005 | <0.01 |
| | 16-18 | 12/19/2001 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| SB-4 | 10-12 | 12/19/2001 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| | 18-20 | 12/19/2001 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| HA-4 | 1-2 | 1/5/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| | 3-3.5 | 1/5/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| HA-5 | 1-2 | 1/5/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| | 3-3.5 | 1/5/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| HA-6 | 0.5-1.0 | 1/5/2002 | 0.161 | <0.005 | <0.005 | <0.005 | <0.01 |
| | 2-2.5 | 1/5/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| HA-7 | 1-2 | 1/5/2002 | 2.270 | 11 | 0.013 | <6 | 0.03 |
| | 2-3 | 1/5/2002 | 2.110 | 21 | 0.025 | <6 | 0.11 |
| HA-8 | 1-2 | 1/5/2002 | 0.033 | <0.005 | <0.005 | 0.019 | <0.01 |
| | 3-4 | 1/5/2002 | 0.009 | <0.005 | <0.005 | 0.108 | 0.04 |
| HA-9 | 1-2 | 1/5/2002 | <0.005 | <0.005 | <0.005 | 0.036 | <0.01 |
| | 2-3 | 1/5/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| HA-10 | 1-2 | 1/5/2002 | 169 | 4.3 | <0.005 | 0.7 | 0.05 |
| | 2-2.5 | 1/5/2002 | 26.8 | 2.8 | <0.005 | 3.2 | <1 |
| HA-11 | 1-2 | 1/5/2002 | <0.005 | <0.005 | <0.005 | 0.036 | <0.01 |
| | 2-3 | 1/5/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| GS-1 | 6-8 | 8/15/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| | 16-18 | 8/16/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |

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| Chemicals of Concern (CAS) | | PCE (127-18-4) | TCE (78-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|-------|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} Soil _{ing} PCL without MSD | | 0.05 | 0.03 | 0.05 | 0.25 | 0.49 | 0.02 |
| Tier 1 ^{Tot} Soil _{Comb} Critical PCL with MSD | | 98 | 150 | 1,800 | 770 | 1,400 | 3.7 |
| Tier 1 ^{Alt} Soil _{Int-v} Critical PCL | | 620 | 210 | 3,100 | 12,000 | 12,000 | 41 |
| GS-2 | 14-16 | <0.6 | 0.156 | <0.005 | 2.1 | <0.005 | 0.09 |
| | 16-18 | 0.055 | 0.011 | <0.005 | 0.22 | <0.005 | <0.01 |

Table 6.2 – Summary of Groundwater Sampling Results

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| Well ID | Date | (mg/L) | (mg/L) | (mg/L) | (mg/L) | (mg/L) |
| MW-1 | 9/7/2000 | | <0.005 | <0.005 | <0.005 | <0.010 |
| | 1/30/2001 | | <0.005 | <0.005 | <0.005 | <0.002 |
| | 7/30/2001 | | <0.001 | <0.001 | <0.001 | <0.002 |
| | 12/27/2001 | | <0.001 | <0.001 | <0.001 | <0.002 |
| | 8/28/2002 | | <0.001 | <0.001 | <0.001 | <0.002 |
| | 12/11/2002 | | <0.005 | <0.005 | <0.005 | <0.002 |
| | 9/4/2003 | | <0.005 | <0.00013 | <0.00012 | <0.00009 |
| | 4/15/2004 | | <0.002 | <0.002 | <0.002 | <0.002 |
| | 9/14/2004 | | <0.002 | 0.0011 J | <0.002 | <0.002 |
| | 12/7/2004 | | <0.002 | <0.002 | <0.002 | <0.002 |
| | 3/17/2005 | | <0.002 | <0.002 | <0.002 | <0.002 |
| | 6/29/2005 | | <0.002 | <0.002 | <0.002 | <0.002 |
| | 10/7/2005 | | <0.002 | <0.002 | <0.002 | <0.002 |
| | 1/30/2006 | | <0.002 | <0.002 | <0.002 | <0.002 |
| | 5/3/2006 | | <0.002 | <0.002 | <0.002 | <0.002 |
| | 9/6/2006 | | <0.0005 | <0.0005 | <0.0006 | <0.0006 |
| | 11/14/2006 | | <0.0005 | <0.0005 | <0.0006 | <0.0006 |
| | 2/14/2007 | | <0.0005 | <0.0005 | <0.0006 | <0.0006 |
| | 5/16/2007 | | <0.0005 | <0.0005 | <0.0006 | <0.0006 |
| | 8/21/2007 | | <0.0005 | <0.0005 | <0.0006 | <0.0006 |
| MW-2 | 9/7/2000 | | 0.029 | <0.005 | <0.005 | <0.010 |
| | 1/30/2001 | | 0.05 | <0.005 | <0.005 | <0.002 |
| | 7/30/2001 | | 0.048 | <0.001 | <0.001 | <0.002 |
| | 12/27/2001 | | 0.019 | <0.001 | <0.001 | <0.002 |
| | 8/28/2002 | | 0.235 | <0.001 | <0.001 | 0.005 |
| | 12/11/2002 | | 0.00994 | <0.005 | <0.005 | <0.002 |
| | 9/4/2003 | | <0.00011 | <0.00013 | <0.00012 | <0.00009 |
| | 4/16/2004 | | 0.001 | <0.002 | <0.002 | <0.002 |

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cle-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-2 | | | | | | |
| Continued | | | | | | |
| 9/14/2004 | 0.0054 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 12/7/2004 | 0.0112 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 3/17/2005 | 0.0027 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 6/29/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 10/7/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 1/30/2006 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 5/3/2006 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/6/2006 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 11/14/2006 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 2/13/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 5/16/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 8/21/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| MW-3 | | | | | | |
| 9/7/2000 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.010 |
| 1/30/2001 | 0.008 | <0.005 | <0.005 | 0.006 | <0.001 | <0.002 |
| 7/30/2001 | 0.0013 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| 12/27/2001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| 8/28/2002 | 0.05 | 0.002 | <0.001 | 0.0101 | <0.001 | <0.002 |
| 9/24/2002 | <0.001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| 12/6/2002 | <0.001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| 9/5/2003 | <0.00011 | <0.00011 | <0.00013 | <0.00016 | <0.00012 | <0.00009 |
| 4/16/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/14/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 12/7/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 3/15/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 6/29/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 10/6/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 1/30/2006 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 5/4/2006 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/6/2006 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 11/14/2006 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 2/14/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Ar} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-3 Continued | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| MW-3D | <0.0005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.002 |
| 9/11/02 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 4/16/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/14/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 12/7/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 3/15/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 6/29/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 10/6/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 1/30/2006 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 5/4/2006 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/6/2006 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 11/14/2006 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 2/14/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 5/16/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 8/21/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| MW-4 | 0.152 | 0.014 | <0.005 | 0.14 | <0.005 | <0.01 |
| 9/7/2000 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.002 |
| 1/30/2001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| 7/30/2001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| 12/27/2001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| 8/28/2002 | <0.001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| 12/6/2002 | <0.001 | <0.001 | <0.001 | 0.00168 | <0.001 | <0.002 |
| 9/5/2003 | 0.00118 | 0.00061 | <0.00013 | 0.00056 | <0.00012 | <0.00009 |
| 4/16/2004 | 0.0014 | 0.0012 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/15/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 12/7/2004 | <0.002 | 0.0011 J | <0.002 | <0.002 | <0.002 | <0.002 |
| 3/17/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 6/30/2005 | 0.001 J | 0.0011 J | <0.002 | <0.002 | <0.002 | <0.002 |
| 10/7/2005 | 0.0086 | 0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 1/30/2006 | 0.0063 | 0.0012 J | <0.002 | <0.002 | <0.002 | <0.002 |
| 5/4/2006 | 0.0013 J | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/6/2006 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Ar} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-4 Continued | | | | | | |
| 11/14/2006 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 2/14/2007 | 0.0025 J | 0.0011 J | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 5/16/2007 | 0.0016 J | 0.0012 J | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 8/21/2007 | 0.0021 J | 0.00097 J | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| MW-5 | | | | | | |
| 9/7/2000 | 8.0 | 0.3 | <0.005 | 3.9 | 0.009 | 0.2 |
| 1/30/2001 | 10.0 | 1.0 | <0.005 | 8.7 | <0.2 | 1.2 |
| 7/30/2001 | 31.3 | 2.54 | 0.0699 | 19.6 | 0.0736 | 2.9 |
| 12/27/2001 | 29.9 | 2.6 | <0.001 | 19.9 | 0.035 | <2.0 |
| 8/28/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| 12/6/2002 | <0.001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| 9/5/2003 | <0.00011 | <0.00011 | <0.00013 | <0.00016 | <0.00012 | <0.00009 |
| 4/16/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/15/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 12/8/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 3/17/2005 | 0.645 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 7/1/2005 | 1.47 a | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 10/7/2005 | 6.24 a | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 1/30/2006 | 5.46 | <0.10 | <0.10 | <0.10 | <0.10 | <0.10 |
| 5/5/2006 | 9.46 | 1.03 | <0.10 | 10.0 | 0.304 | <0.10 |
| 9/6/2006 | 12.0 | 1.8 | 0.059 | 17.0 | 0.079 | 1.4 |
| 11/14/2006 | 11.0 | 2.0 | 0.033 J | 17.0 | 0.024 J | 1.3 |
| 2/14/2007 | 15.0 | 2.2 | 0.049 J | 17.0 | 0.03 J | 1.8 |
| 5/16/2007 | 10.0 | 2.0 | 0.043 J | 14.0 | 0.032 J | 1.2 |
| 8/21/2007 | 6.1 | 1.4 | 0.033 J | 13.0 | 0.032 J | 1.0 |
| MW-6 | | | | | | |
| 9/27/2000 | 0.054 | 0.005 | <0.005 | 0.027 | <0.005 | <0.01 |
| 1/31/2001 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.002 |
| 7/30/2001 | 0.036 | 0.0041 | <0.001 | 0.029 | <0.001 | 0.002 |
| 12/27/2001 | <0.001 | <0.001 | <0.001 | 0.005 | <0.001 | <0.002 |
| 8/28/2002 | 0.0021 | <0.001 | <0.001 | 0.021 | <0.001 | 0.01 |
| 9/24/2002 | <0.001 | 0.001 | <0.001 | 0.028 | <0.001 | 0.005 |
| 12/10/2002 | <0.005 | <0.005 | <0.005 | 0.0712 | <0.005 | 0.00696 |
| 9/5/2003 | <0.00011 | <0.00011 | <0.00013 | <0.00016 | <0.00012 | <0.00009 |

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-6 | | | | | | |
| Continued | | | | | | |
| 4/16/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/14/2004 | <0.002 | <0.002 | <0.002 | 0.0159 | <0.002 | 0.0024 |
| 12/8/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 3/17/2005 | <0.002 | <0.002 | <0.002 | 0.0062 | <0.002 | <0.002 |
| 6/29/2005 | <0.002 | <0.002 | <0.002 | 0.0012 J | <0.002 | <0.002 |
| 10/6/2005 | 0.0077 | 0.0012 | <0.002 | 0.0099 | <0.002 | 0.0014 |
| 1/31/2006 | <0.002 | <0.002 | <0.002 | 0.0049 | <0.002 | 0.001 |
| 5/4/2006 | <0.002 | <0.002 | <0.002 | 0.0068 | <0.002 | 0.0014 J |
| 9/7/2006 | <0.0005 | <0.0007 | <0.0006 | 0.010 | <0.0006 | <0.0006 |
| 11/15/2006 | <0.0005 | <0.0007 | <0.0006 | 0.0075 | <0.0006 | <0.0006 |
| 2/14/2007 | <0.0005 | <0.0007 | <0.0006 | 0.0075 | <0.0006 | <0.0006 |
| 5/17/2007 | <0.0005 | <0.0007 | <0.0006 | 0.0053 | <0.0006 | 0.001 J |
| 8/22/2007 | <0.0005 | <0.0007 | <0.0006 | 0.012 | <0.0006 | 0.0019 J |
| MW-7 | | | | | | |
| 9/7/2000 | 1.7 | 0.178 | <0.005 | 3.2 | <0.005 | 0.06 |
| 1/31/2001 | 7.9 | 0.108 | <0.005 | 3.4 | 0.006 | 0.178 |
| 7/31/2001 | 9.2 | 0.52 | 0.008 | 4.3 | 0.008 | 0.44 |
| 12/27/2001 | 13.8 | 0.76 | 0.0154 | 4.9 | 0.009 | <1.0 |
| 9/5/2003 | 0.048 | 0.0014 | <0.00013 | <0.00016 | <0.00012 | <0.00009 |
| 4/16/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/14/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 12/8/2004 | 0.0037 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 3/17/2005 | 0.112 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 6/30/2005 | 0.192 | 0.056 | <0.002 | 0.0724 | <0.002 | <0.002 |
| 10/7/2005 | 0.0881 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 1/31/2006 | 0.169 | 0.041 | <0.002 | 0.0279 | <0.002 | <0.002 |
| 5/5/2006 | 0.0958 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/6/2006 | 0.0095 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 11/15/2006 | 0.021 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 2/14/2004 | NS | NS | NS | NS | NS | NS |
| 5/17/2007 | 0.041 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 8/21/2007 | 0.046 | 0.046 | <0.0006 | 0.015 | <0.0006 | <0.0006 |

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-7R | | | | | | |
| 8/28/2002 | 12.2 | 0.741 | <0.001 | 5.93 | 0.0134 | 1.09 |
| 12/11/2002 | 16.3 | 2.41 | 0.00748 | 5.48 | 0.00597 | 0.197 |
| 4/16/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/14/2004 | 0.144 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 12/8/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 3/17/2005 | 0.0126 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 6/30/2005 | 0.0867 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 10/7/2005 | 0.0175 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 1/31/2006 | 0.0766 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 5/5/2006 | 0.0116 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/6/2006 | 0.0085 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 11/15/2006 | 0.0092 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 2/14/2007 | 0.012 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 5/17/2007 | NS | NS | NS | NS | NS | NS |
| 8/22/2007 | NS | NS | NS | NS | NS | NS |
| MW-8 | | | | | | |
| 1/31/2001 | 0.114 | 0.008 | <0.005 | 0.058 | <0.005 | 0.006 |
| 7/30/2001 | 0.024 | 0.004 | <0.001 | 0.018 | <0.001 | <0.002 |
| 12/27/2001 | 0.001 | 0.002 | <0.001 | 0.006 | <0.001 | <0.002 |
| 8/28/2001 | 0.002 | 0.001 | <0.001 | 0.003 | <0.001 | <0.002 |
| 12/10/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.002 |
| 9/5/2003 | <0.00011 | <0.00011 | <0.00013 | <0.00016 | <0.00012 | <0.00009 |
| 4/16/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/15/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 12/8/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 3/17/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 6/29/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 10/6/2005 | 0.0039 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 1/31/2006 | 0.006 | 0.00079 J | <0.002 | <0.002 | <0.002 | <0.002 |
| 5/5/2006 | 0.0016 J | <0.002 | <0.002 | 0.0011 J | <0.002 | <0.002 |
| 9/7/2006 | 0.00051 J | <0.0007 | <0.0006 | <0.002 | <0.002 | <0.002 |
| 11/14/2006 | <0.0005 | <0.0007 | <0.0006 | 0.0015 J | <0.0006 | <0.0006 |
| 2/13/2007 | <0.0005 | <0.0007 | <0.0006 | 0.017 | <0.0006 | <0.0006 |
| | | | | 0.0027 J | <0.0006 | <0.0006 |

InControl Technologies, Inc.

| Chemicals of Concern (CAS) | | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|------------|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-8 Continued | 5/17/2007 | <0.0005 | <0.0007 | <0.0006 | 0.021 | <0.0006 | 0.0023 |
| | 8/22/2007 | <0.0005 | <0.0007 | <0.0006 | 0.0048 J | <0.0006 | <0.0006 |
| MW-9 | 1/31/2001 | 3.2 | 0.22 | <0.05 | 1.28 | <0.05 | 0.11 |
| | 7/30/2001 | 1.68 | 0.179 | <0.001 | 0.64 | 0.002 | 0.093 |
| | 12/28/2001 | 4.4 | 0.46 | 0.0068 | 1.99 | 0.004 | <0.2 |
| | 8/28/2001 | 0.027 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| | 12/10/2002 | 63.6 | 2.96 | <0.005 | 14.5 | 0.00856 | 0.0891 |
| | 9/8/2003 | <0.00011 | <0.00011 | <0.0013 | <0.00016 | <0.00012 | <0.00009 |
| | 5/13/2004 | 0.0046 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 9/15/2004 | 0.0129 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 12/9/2004 | 0.0051 | <0.002 | <0.002 | 0.003 | <0.002 | <0.002 |
| | 3/15/2005 | 0.0031 | 0.0017 | <0.002 | 0.0021 | <0.002 | <0.002 |
| | 6/30/2005 | 0.0023 | 0.0014 J | <0.002 | 0.0012 J | <0.002 | <0.002 |
| | 10/7/2005 | 0.0078 | 0.002 | <0.002 | 0.0033 | <0.002 | <0.002 |
| | 1/31/2006 | 0.0085 | 0.0016 J | <0.002 | 0.0026 | <0.002 | <0.002 |
| | 5/4/2006 | 0.0076 | 0.0011 J | <0.002 | 0.0023 | <0.002 | <0.002 |
| | 9/5/2006 | NS | NS | NS | NS | NS | NS |
| | 11/14/2006 | NS | NS | NS | NS | NS | NS |
| MW-9R | 3/13/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| | 5/16/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| | 8/22/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| MW-10 | 1/31/2001 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.002 |
| | 7/30/2001 | <0.001 | <0.001 | <0.001 | 0.005 | <0.0001 | <0.002 |
| | 12/28/2001 | 0.044 | 0.005 | <0.001 | 0.015 | <0.0001 | <0.002 |
| | 9/24/2002 | <0.001 | <0.001 | <0.001 | <0.001 | <0.0001 | <0.002 |
| | 12/10/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.002 |
| | 9/8/2003 | <0.00011 | <0.00011 | <0.00013 | <0.00016 | <0.00012 | <0.00009 |
| | 5/13/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 9/15/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 12/9/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 3/15/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 6/29/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |

InControl Technologies, Inc.

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|--|---|---|--|---|--|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-10 Continued | 10/6/2005 1/30/2006 5/3/2006 9/6/2006 11/14/2006 2/15/2007 5/16/2007 | <0.002 <0.002 <0.002 NS NS NS NS | <0.002 <0.002 <0.002 NS NS NS NS | <0.002 <0.002 <0.002 NS NS NS NS | <0.002 <0.002 <0.002 NS NS NS NS | <0.002 <0.002 <0.002 NS NS NS NS |
| MW-10R | 4/16/2004 9/15/2004 12/8/2004 3/15/2005 6/30/2005 10/6/2005 1/31/2006 5/4/2006 9/5/2006 11/14/2006 2/15/2007 5/16/2007 8/22/2007 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 | <0.002 <0.002 <0.002 0.00088 J <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 0.00088 J <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 |
| MW-11 | 7/30/2001 12/27/2001 8/28/2002 12/7/2002 9/5/2003 4/16/2004 9/15/2004 12/8/2004 3/17/2005 6/30/2005 10/6/2005 1/31/2006 | 0.0025 <0.001 <0.001 <0.001 <0.001 <0.001 Not sampled - Insufficient Groundwater Accumulation <0.002 <0.002 <0.002 <0.002 <0.002 | <0.001 <0.001 <0.001 <0.001 <0.001 <0.001 Not sampled - Insufficient Groundwater Accumulation <0.002 <0.002 <0.002 <0.002 <0.002 | 0.002 <0.001 <0.001 <0.001 <0.001 <0.001 Not sampled - Insufficient Groundwater Accumulation <0.002 <0.002 <0.002 <0.002 <0.002 | <0.001 <0.001 <0.001 <0.001 <0.001 <0.001 Not sampled - Insufficient Groundwater Accumulation <0.002 <0.002 <0.002 <0.002 <0.002 | <0.002 0.007 <0.002 <0.002 <0.002 <0.002 Not sampled - Insufficient Groundwater Accumulation <0.002 <0.002 <0.002 <0.002 <0.002 |

| Chemicals of Concern (CAS) | | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|------------|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} Critical PCL without MSD | | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} ^{GW} Critical PCL with MSD | | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-11 Continued | 5/3/2006 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 9/6/2006 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| | 11/15/2006 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| | 2/14/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| | 5/17/2007 | 0.0006 J | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| | 8/21/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| | 7/30/2001 | 0.004 | <0.001 | <0.001 | 0.001 | <0.001 | <0.002 |
| MW-12 | 12/28/2001 | 0.015 | 0.002 | <0.001 | 0.006 | <0.001 | <0.002 |
| | 9/24/2002 | <0.001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| | 12/10/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.002 |
| | 4/15/2004 | <0.002 | 0.0016 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 9/15/2004 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 12/8/2004 | <0.002 | 0.0014 J | <0.002 | <0.002 | <0.002 | <0.002 |
| | 3/15/2005 | 0.0018 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 6/30/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 10/6/2005 | <0.002 | 0.001 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 1/30/2006 | 0.00081 J | 0.0017 J | <0.002 | <0.002 | <0.002 | <0.002 |
| | 5/4/2006 | 0.00088 J | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| | 9/5/2006 | <0.0005 | 0.0016 J | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| | 11/14/2006 | <0.0005 | 0.0013 J | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| | 2/14/2007 | <0.0005 | 0.00097 J | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| | 5/17/2007 | <0.0005 | 0.0014 J | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| | 8/22/2007 | <0.0005 | 0.0016 J | <0.0006 | 0.00073 J | <0.0006 | <0.0006 |
| MW-13 | 7/30/2001 | 0.03 | 0.0187 | <0.001 | 0.023 | <0.001 | 0.002 |
| | 12/28/2001 | 0.396 | 0.098 | 0.001 | 0.383 | <0.001 | 0.041 |
| | 9/24/2002 | 0.037 | 0.015 | <0.001 | 0.017 | <0.001 | <0.002 |
| | 12/11/2002 | 0.0351 | 0.0175 | <0.005 | 0.0128 | <0.005 | <0.002 |
| | 4/15/2004 | 0.0307 | 0.0064 | <0.002 | 0.0031 | <0.002 | <0.002 |
| | 9/15/2004 | 0.0097 | 0.0032 | <0.002 | 0.0067 | <0.002 | <0.002 |
| | 12/8/2004 | 0.0137 | 0.0035 | <0.002 | 0.024 | <0.002 | <0.002 |
| | 3/15/2005 | 0.0137 | 0.0069 | <0.002 | 0.0068 | <0.002 | <0.002 |
| | 6/30/2005 | 0.0046 | 0.002 | <0.002 | 0.0066 | <0.002 | 0.0012 J |

InControl Technologies, Inc.

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|-------------------|------------------|---|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-13 Continued | | | | | | |
| 10/7/2005 | 0.0088 | 0.0027 | <0.002 | 0.0039 | <0.002 | 0.0012 |
| 1/31/2006 | 0.0044 | 0.0035 | <0.002 | 0.0021 | <0.002 | <0.002 |
| 5/4/2006 | 0.0035 | 0.0028 | <0.002 | 0.0018 J | <0.002 | <0.002 |
| 9/6/2006 | 0.0065 | 0.003 J | <0.0006 | 0.0022 J | <0.0006 | <0.0006 |
| 11/14/2006 | 0.0075 | 0.0074 | <0.0006 | 0.0036 J | <0.0006 | <0.0006 |
| 2/14/2007 | 0.01 | 0.0078 | <0.0006 | 0.0046 J | <0.0006 | <0.0006 |
| 5/17/2007 | 0.014 | 0.011 | <0.0006 | 0.0049 J | <0.0006 | <0.0006 |
| 8/22/2007 | 0.011 | 0.0087 | <0.0006 | 0.00023 J | <0.0006 | <0.0006 |
| MW-14 | | | | | | |
| 9/24/2002 | 0.01 | 0.002 | <0.001 | 0.004 | <0.001 | <0.002 |
| 5/13/2004 | 0.0634 | 0.0155 | <0.002 | 0.0411 | <0.002 | <0.002 |
| 9/15/2004 | 0.085 | 0.0192 | <0.002 | 0.042 | <0.002 | <0.002 |
| 12/9/2004 | 0.0792 | 0.0194 | <0.002 | 0.0396 | <0.002 | <0.002 |
| 3/15/2005 | 0.0798 | 0.0151 | <0.002 | 0.026 | <0.002 | <0.002 |
| 6/30/2005 | 0.0265 | 0.0093 | <0.002 | 0.0174 | <0.002 | <0.002 |
| 10/7/2005 | 0.0584 | 0.0189 | <0.002 | 0.0258 | <0.002 | <0.002 |
| 1/31/2006 | 0.0373 | 0.0164 | <0.002 | 0.0236 | <0.002 | <0.002 |
| 5/4/2006 | 0.0327 | 0.0126 | <0.002 | 0.0153 | <0.002 | <0.002 |
| 9/5/2006 | | | Not sampled - No Groundwater Accumulation | | | |
| 11/14/2006 | | | Not sampled - No Groundwater Accumulation | | | |
| 2/14/2007 | 0.028 | 0.0084 | <0.0006 | 0.0072 | <0.0006 | <0.0006 |
| 5/18/2007 | 0.025 | 0.0086 | <0.0006 | 0.0073 | <0.0006 | <0.0006 |
| 8/22/2007 | 0.022 | 0.0074 | <0.0006 | 0.0057 | <0.0006 | <0.0006 |
| MW-15 | | | | | | |
| 8/27/2001 | 0.009 | <0.005 | <0.005 | <0.005 | <0.005 | <0.002 |
| 12/27/2001 | 0.017 | 0.006 | <0.001 | 0.004 | <0.001 | <0.002 |
| 9/24/2002 | 0.01 | 0.003 | <0.001 | 0.003 | <0.001 | <0.002 |
| 12/11/2002 | 0.0109 | <0.005 | <0.005 | <0.005 | <0.005 | <0.002 |
| 4/15/2004 | 0.0127 | 0.0043 | <0.002 | 0.0028 | <0.002 | <0.002 |
| 9/14/2004 | 0.0053 | 0.004 | <0.001 | 0.003 | <0.001 | <0.0015 |
| 12/7/2004 | 0.0027 | 0.0021 | <0.002 | 0.0014 J | <0.002 | <0.002 |
| 3/15/2005 | 0.0077 | 0.0046 | <0.002 | 0.0031 | <0.002 | <0.002 |
| 6/30/2005 | 0.0024 | 0.0018 J | <0.002 | 0.0013 J | <0.002 | <0.002 |
| 10/7/2005 | 0.0039 | 0.0028 | <0.002 | 0.0019 | <0.002 | <0.002 |

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|---|---|---|--|---|--|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-15 Continued | 0.0018 J 0.0031 J 0.0091 0.005 0.00073 J 0.0014 J 0.001 J | 0.0017 J 0.001 J <0.0007 <0.0007 0.00073 J 0.00098 J <0.0007 | <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | 0.0011 J 0.001 J 0.00073 J <0.0005 0.00064 J 0.00064 J <0.0005 | <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 |
| MW-16 | 0.004 <0.001 <0.001 <0.005 <0.002 <0.002 <0.002 0.0011 J <0.002 <0.002 <0.002 0.0015 J <0.0005 <0.0005 <0.0005 <0.0005 | <0.001 <0.001 <0.001 <0.005 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 0.0011 <0.002 <0.002 <0.002 <0.0007 <0.0007 <0.0007 <0.0007 <0.0007 | <0.001 <0.001 <0.001 <0.005 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 0.0016 <0.002 <0.002 <0.002 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 | 0.002 <0.001 <0.001 <0.001 <0.005 <0.002 <0.002 <0.002 <0.002 <0.002 0.0016 <0.002 <0.002 <0.002 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 | <0.001 <0.001 <0.001 <0.005 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 0.0016 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.002 <0.001 <0.001 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 |
| MW-17 | 0.004 0.047 <0.001 <0.001 0.0191 <0.002 <0.002 <0.002 | <0.001 <0.001 <0.001 <0.001 0.0011 <0.002 <0.002 <0.002 | <0.001 <0.001 <0.001 <0.001 <0.00013 <0.002 <0.002 <0.002 | 0.0043 0.00235 0.00119 0.00222 0.00155 <0.002 <0.002 <0.002 | <0.001 <0.001 <0.001 <0.001 <0.00012 <0.002 <0.002 <0.002 | <0.002 <0.002 <0.002 <0.002 <0.00009 <0.002 <0.002 <0.002 |

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-17 | | | | | | |
| Continued | | | | | | |
| 3/17/2005 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 6/29/2005 | 0.0036 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 10/7/2005 | 0.0056 | 0.0013 | <0.002 | <0.002 | <0.002 | <0.002 |
| 1/31/2006 | 0.0023 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 5/4/2006 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002 |
| 9/6/2006 | 0.00088 J | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 11/14/2006 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 2/14/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 5/16/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| 8/21/2007 | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |
| MW-18 | | | | | | |
| 12/27/2001 | 0.096 | 0.067 | <0.01 | 1.04 | <0.01 | 0.492 |
| 8/28/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| 12/7/2002 | <0.001 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| 9/4/2003 | 0.0167 | <0.00011 | <0.00013 | <0.00016 | <0.00012 | <0.00009 |
| 4/16/2004 | 0.702 | 0.13 | 0.0027 | 0.585 | 0.0024 | 0.0812 |
| 9/14/2004 | 0.804 | 0.308 | 0.007 | 1.81 | 0.0051 | 0.335 |
| 12/7/2004 | 0.82 | 0.219 | <0.02 | 1.12 | <0.02 | 0.199 |
| 3/17/2005 | 0.25 | 0.0657 | <0.1 | 0.874 | <0.1 | 0.188 |
| 7/1/2005 | 0.196 | 0.0744 | 0.0031 | 0.749 a | 0.0022 | 0.137 |
| 10/7/2005 | 0.0921 | 0.0487 | 0.0039 | 3.910 a | 0.0029 | 0.133 |
| 1/31/2006 | 0.177 | 0.0831 | <0.050 | 0.864 | <0.050 | <0.050 |
| 5/5/2006 | 0.0402 | 0.0399 | <0.01 | 0.66 | <0.01 | 0.0693 |
| 9/6/2006 | 0.036 | 0.05 | 0.0034 J | 0.82 | 0.0024 J | 0.12 |
| 11/14/2006 | 0.038 | 0.056 | 0.0033 J | 0.89 | 0.0022 J | 0.14 |
| 2/14/2007 | 0.021 | 0.04 | 0.0029 J | 0.58 | 0.0023 J | 0.17 |
| 5/16/2007 | 0.021 | 0.037 | 0.0025 J | 0.53 | 0.0022 J | 0.14 |
| 8/21/2007 | 0.013 | 0.024 | 0.002 J | 0.55 | 0.0018 J | 0.21 |
| MW-19 | | | | | | |
| 12/28/2001 | 33.7 | 5.46 | <0.5 | 53.5 | <0.5 | 6.8 |
| 8/28/2002 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.01 |
| 12/7/2002 | 0.0347 | <0.001 | <0.001 | <0.001 | <0.001 | <0.002 |
| 9/4/2003 | 24.3 | 2.21 | 0.0428 | 21.6 | 0.158 | 0.36 |
| 4/16/2004 | 17.4 | 2.13 | 0.0384 | 18.6 | 0.0349 | 1.3 |

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|--|---|--|--|---|---|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-19 Continued | 18.9 25.2 34.0 29.3 a 26.3 20.9 4.43 0.0036 J <0.0005 <0.0005 <0.0005 <0.0005 | 2.76 3.41 3.11 3.51 a 3.48 3.45 0.563 <0.0007 <0.0007 <0.0007 <0.0007 <0.0007 | 0.0478 <1.0 <1.0 0.0857 <0.002 <0.5 <0.1 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | 25.8 34.4 38.2 39.6 a 36.3 34.6 5.93 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 | 0.0286 <1.0 <1.0 0.0408 <0.002 <0.500 <0.1 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | 2.61 2.13 3.86 3.07 a 3.4 2.95 0.806 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 |
| MW-20 | 38.2 0.137 <0.005 0.00071 <0.002 0.0248 0.935 151 6.83 a 10 6.52 8.13 4.3 4.5 2.9 2.5 16 | 8.08 <0.001 <0.005 <0.00011 <0.002 <0.002 <0.002 5.92 3.18 a 5.14 3.55 4.19 2.8 2.3 1.2 1.2 7.5 | <0.5 <0.001 <0.005 <0.00013 <0.002 <0.002 <0.002 0.0912 0.02 <0.002 <0.400 <0.4 0.031 0.021 J 0.0096 J 0.012 J 0.081 | 47.9 <0.001 <0.005 <0.00016 <0.002 <0.002 <0.002 18.7 15.5 a 21.4 23.9 37.1 28.0 20.0 8.2 9.0 44.0 | <0.5 <0.001 <0.005 <0.00012 <0.002 <0.002 <0.002 <0.1 0.0578 <0.002 <0.400 <0.4 0.200 0.078 0.054 0.056 0.370 | 6.2 <0.002 <0.002 <0.00009 <0.002 <0.002 <0.002 0.385 0.0688 1.07 1.21 2.91 0.100 0.630 0.067 0.320 2.700 |
| MW-21 | 0.0053 0.0076 0.0048 | <0.005 0.0037 0.0041 | <0.005 <0.002 <0.002 | <0.005 0.0034 0.0038 | <0.005 <0.002 <0.002 | <0.002 <0.002 <0.002 |

InControl Technologies, Inc.

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|--|---|---|---|---|---|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MWV-21 Continued | 0.0028 0.0479 0.0607 0.024 0.0233 0.0374 0.0065 0.0012 J <0.0005 0.0018 J <0.0005 | <0.002 0.0076 0.0074 0.0073 0.0058 0.0072 0.0037 J 0.0028 J 0.00081 J 0.0052 0.0056 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.002 0.0197 0.0191 0.018 0.0119 0.0217 0.0066 0.0035 J 0.00096 J 0.004 J 0.0036 J | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.002 <0.002 <0.002 <0.002 <0.002 0.0023 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 |
| MWV-22 | <0.005 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 | <0.005 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0007 <0.0007 <0.0007 <0.0007 <0.0007 <0.0007 <0.0007 | <0.005 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.005 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 | <0.005 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 |
| MWV-23 | <0.005 <0.00011 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.00011 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 | <0.005 <0.00011 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0007 <0.0007 <0.0007 <0.0007 <0.0007 <0.0007 <0.0007 | <0.005 <0.00013 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.005 <0.00016 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 | <0.005 <0.00012 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.002 <0.00009 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 |

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cis-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|---|--|---|---|---|---|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-23 Continued | 10/6/2005 1/31/2006 5/5/2006 9/7/2006 11/15/2006 2/15/2007 5/17/2007 8/21/2007 | <0.002 0.0043 <0.002 <0.0007 <0.0007 <0.0007 <0.0007 <0.0007 | <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.002 0.0061 <0.002 <0.0005 <0.0005 <0.0005 <0.0005 <0.0005 | <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 |
| MW-24 | 4/15/2004 9/15/2004 12/7/2004 3/15/2005 7/1/2005 10/7/2005 1/31/2006 5/4/2006 9/5/2006 11/13/2006 2/13/2007 5/18/2007 8/22/2007 | 0.011 0.0198 0.0197 0.0132 0.0239 0.0259 0.0319 0.0331 0.038 0.035 0.034 0.026 0.017 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | 0.0108 0.0177 0.0144 0.013 0.024 0.0262 0.0294 0.0381 0.05 0.05 0.051 0.056 0.043 | <0.002 <0.002 0.003 0.0016 0.0026 0.0028 0.0047 0.0046 0.0035 J 0.0041 J 0.0032 J 0.0015 J 0.0018 J | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 0.0021 <0.0006 <0.0006 <0.0006 0.0017 J 0.0014 J |
| MW-25 | 4/15/2004 9/15/2004 12/7/2004 3/15/2005 6/30/2005 10/6/2005 1/30/2006 5/4/2006 9/6/2006 11/13/2006 2/15/2007 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0007 <0.0007 <0.0007 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 0.0012 J <0.0005 <0.0005 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 | <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 |

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cls-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|--|---|---|--|--|--|
| Tier 1 ^{GW} GW _{ing} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{inh-v} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-25 Continued | <0.0005 <0.0005 | <0.0007 <0.0007 | <0.0006 <0.0006 | <0.0005 <0.0005 | <0.0006 <0.0006 | <0.0006 <0.0006 |
| MW-26 | 0.0091 0.042 0.0328 0.0272 0.0252 0.0144 0.0165 0.0225 0.0068 0.009 0.0062 0.0078 0.0076 | 0.0028 0.0143 0.0104 0.0068 0.0076 0.0054 0.0069 0.0098 0.003 J 0.0027 J 0.0014 J 0.0025 J 0.0015 J | <0.0002 <0.0002 <0.0002 <0.0002 <0.0002 <0.0002 <0.0002 <0.0002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.0002 <0.0002 0.0185 0.0111 0.0147 0.0101 0.0156 0.0207 0.0054 0.0061 0.0019 J 0.00093 J <0.0005 | <0.0002 <0.0002 <0.0002 <0.0002 <0.0002 <0.0002 <0.0002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | <0.0002 <0.0002 <0.0002 <0.0002 0.0014 0.0012 <0.0002 0.0031 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 |
| MW-27 | 0.897 0.428 0.503 0.0869 0.0045 <0.0002 <0.0002 <0.0002 <0.0005 0.030 0.480 0.210 0.400 | 0.464 0.263 <0.002 0.0694 0.0059 <0.002 <0.002 <0.0007 <0.0007 0.07 0.036 0.14 | 0.0519 0.0507 <0.002 <0.002 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 <0.0006 | 9.08 7.84 <0.002 1.35 0.589 a <0.002 <0.002 <0.002 <0.0005 <0.0005 0.200 0.170 0.600 | 0.0157 <0.001 <0.002 <0.002 0.0022 <0.002 <0.002 <0.002 <0.0006 <0.0006 0.00072 J <0.0006 0.0056 | 1.48 1.05 <0.002 0.043 0.0843 <0.002 <0.002 <0.002 <0.0006 <0.0006 <0.0006 <0.0006 0.021 |
| MW-28 | 0.006 <0.002 0.0016 J 0.0019 | 0.0036 <0.002 0.0026 0.004 | <0.002 <0.002 <0.002 <0.002 | 0.0042 <0.002 0.0033 0.0056 | <0.002 <0.002 <0.002 <0.002 | <0.002 <0.002 <0.002 <0.002 |

| Chemicals of Concern (CAS) | PCE (127-18-4) | TCE (79-01-6) | 1,1-DCE (75-35-4) | cls-1,2-DCE (159-59-2) | trans-1,2-DCE (156-60-5) | VC (75-01-4) |
|--|-------------------|------------------|----------------------|---------------------------|-----------------------------|-----------------|
| Tier 1 ^{GW} GW _{imp} Critical PCL without MSD | 0.005 | 0.005 | 0.007 | 0.07 | 0.1 | 0.002 |
| Tier 1 ^{Alr} GW _{imp-V} Critical PCL with MSD | 330 | 160 | 980 | 16,000 | 10,000 | 3.6 |
| MW-28 | | | | | | |
| Continued | 0.0016 J | 0.0048 | <0.002 | 0.005 | <0.002 | <0.002 |
| 5/3/2006 | 0.0016 J | 0.0054 | <0.002 | 0.0051 | <0.002 | <0.002 |
| 9/6/2006 | 0.0015 J | 0.0034 J | <0.0006 | 0.005 | <0.0006 | <0.0006 |
| 11/13/2006 | 0.0011 J | 0.0044 J | <0.0006 | 0.0047 J | <0.0006 | <0.0006 |
| 2/13/2007 | 0.0024 J | 0.0032 J | <0.0006 | 0.004 J | <0.0006 | <0.0006 |
| 5/18/2007 | 0.0015 J | 0.0033 J | <0.0006 | 0.003 J | <0.0006 | <0.0006 |
| 8/22/2007 | 0.0014 J | 0.0038 J | <0.0006 | 0.0032 J | <0.0006 | <0.0006 |
| Drainage Ditch | <0.0005 | <0.0007 | <0.0006 | <0.0005 | <0.0006 | <0.0006 |

NOTES:

- (1) - Analyte was detected in the associated method blank
- a-Results from Run #2

Item 7 – Plume Stability

The Dry Clean, Etc. property (the Site) has been affected by dissolved phase contaminants (PCE, TCE, 1,1-DCE, cis-1,2-DCE and VC) in the soil and groundwater. These contaminants are believed to be associated with the historic dry cleaning operations conducted in the Dry Clean, Etc. tenant space.

The groundwater impact has been horizontally delineated in all directions and has migrated off-site in the downgradient direction. Groundwater monitoring wells MW-1 and MW-4 are the upgradient delineation points and groundwater monitoring wells MW-15, MW-16, MW-21 and MW-25 are the downgradient delineation points. Cross-gradient delineation monitoring points are MW-6, MW-10, MW-10R and MW-17 to the west and MW-3, MW-8, MW-9R, MW-12 and MW-19 to the east.

A comparison of the sampling results from September 2000 and August 2007 indicates that the area of impact appears to be stable to decreasing over time. The source area wells are MW-5, MW-19, MW-20 and MW-27. While the concentration of COCs declined drastically during the treatment process, the COC concentrations have since rebounded but to levels less than the pretreatment concentration. COC concentrations in MW-19 have significantly decreased and remain below the critical PCLs for the past five consecutive sampling events. The total mass in groundwater in the source area has been reduced by at least 80 percent based on current groundwater monitoring results. This significant reduction in mass is also reflected in many of the downgradient wells as they have also demonstrated significant declines in COC concentrations. Groundwater samples collected from monitor well MW-5 reported a peak PCE concentration of 31.3 mg/L and has since declined to concentrations at or less than 10 mg/L. This represents a 66% reduction.

COC concentrations in the source area wells (MW-5, MW-19, MW-20 and MW-27) appear to be declining over the sampling history of the site. COC concentrations in monitoring well MW-19 started at a maximum concentration of 33.7 mg/L PCE and has since declined to less than the laboratory detection limit (0.0005 mg/L) representing a 99% reduction in concentration. MW-20 had an initial PCE concentration of 38.2 mg/L and has since declined to an average concentration of 5 mg/L. This represents almost 87% reduction in concentration. The reported PCE concentration in MW-27 was initially 0.897 mg/L and has since decreased to 0.4 mg/L representing a 55% reduction. COC concentrations in wells located within the dissolved phase plume (MW-7 (9.2 to 0.046 mg/L), MW-9 (63.6 to less than 0.0005 mg/L), MW-10 (0.044 to <0.0005 mg/L), MW-10R (0.024 to <0.0005 mg/L), MW-13 (0.396 to 0.011 mg/L), MW-14 (0.085 to 0.022 mg/L) and MW-26 (0.042 to 0.0076 mg/L)) appear to be declining over the sampling history of the site. The reduction is primarily due to the removal of the source in soil and treatment of shallow groundwater source area.

Item 8 – Contamination Exceedence Discussion (without MSD)

On the Designated Property

As described in **Item 4**, PCE, TCE, 1,1-DCE, cis-1,2-DCE and VC were reported at concentrations that exceeded the TRRP residential assessment levels without a municipal setting designation. Groundwater

samples collected from on-site monitoring wells MW-5, MW-7, MW-18, MW-20 and MW-27 were reported PCE, TCE, 1,1-DCE, cis-1,2-DCE and/or VC at concentrations greater than the TRRP residential ingestion exceedence level without a municipal setting designation ($^{GW}GW_{Ing}$). A review of the most recent groundwater sampling data (August 2007) confirms these findings.

Off the Designated Property

Several groundwater monitoring wells (MW-13, MW-14 and MW-26) installed on the Bimini Isle Condominims property to the south confirm groundwater impacted by chlorinated solvents from the Dry Clean, Etc. source area have extended beneath the Bissonnet right-of-way onto the adjacent property to the south. PCE and/or TCE were reported at concentrations greater than the TRRP residential ingestion exceedence level ($^{GW}GW_{Ing}$). Groundwater samples collected from monitoring wells MW-15, MW-16, MW-21 and MW-25 reported COC concentrations near or below the laboratory detection limits. This line of groundwater monitoring wells serves as the downgradient plume boundary and confirms impacted groundwater does not extend beyond the southern property boundary of the Bimini Isle Condominiums. A review of the most recent groundwater sampling data (August 2007) confirm these findings. In addition, the concentration of target COCs continues to decline in these wells.

Item 9 – Future Contamination Exceedence Discussion (with MSD)

Recent groundwater monitoring on the subject property indicates that the area of groundwater impact has been horizontally delineated. A comparison of the September 2000 and August 2007 sampling results indicates that the plume appears to be generally stable and is expected to be decreasing over time. Based on the results of historical and recent groundwater sampling results, InControl Technologies does anticipate continued impact to off-site areas from the subject property, especially in the downgradient direction but not at concentrations which would exceed the TRRP residential ingestion exceedence level with a municipal setting designation ($^{Air}GW_{Inh-v}$). Historically COC concentrations in groundwater samples collected from groundwater monitoring wells located on and off-site have not exceeded the TRRP residential ingestion exceedence level with a municipal setting designation ($^{Air}GW_{Inh-v}$). The source in soil has been removed and significant efforts have been made to reduce the concentration of site related COCs in groundwater at the source area. The success of these efforts is reflected in the continual decline in COC concentrations on the Bimini Isles Condominums property.

Item 10 – Origin of Contamination

Dry Clean, Etc. operated an on-site dry cleaning facility from 1982 through 2000. Historic use of PCE as a dry cleaning solvent in the dry cleaning equipment is believed to have resulted in impacts to soil and shallow groundwater. PCE and its breakdown products have been identified in soil and groundwater. The property to the adjacent south is an occupied apartment complex (Bimini Isle Condominiums) and properties to the adjacent north are residential. Operations to the east and west are also commercial but, at this time, are not believed to have contributed to on-site contamination and are unrelated to the PCE contamination.

Item 11 – Regulatory Actions

Not Applicable. No regulatory actions have been taken in the last five years.

Item 12 – Existing State or EPA registrations, permits or identifications

According to the TCEQ's dry cleaner registration database, the registration issued to Dry Clean, Etc. is valid through December 31, 2007.

RCRA Handler ID – TXD103849899
Texas State Customer Number – CN602540478
Texas State Registration Number – RN102000841

Dry Clean, Etc. is currently operating as a drop station only.

Item 13 – VCP Enrollment

In 2001, Fondren Road Plaza, Ltd. submitted a Voluntary Cleanup Program (VCP) Application and Agreement to the Texas Commission on Environmental Quality (TCEQ). Dry Clean, Etc. was assigned VCP No. 1395.

Item 14 – TCEQ Submittals

Previous consultants Malcolm Pirnie and IRC submitted various documents to the TCEQ including an *Affected Property Assessment Report* submitted by Malcolm Pirnie in September 2001. The following is a listing of those submittals.

- Application to Voluntary Cleanup Program, dated September 27, 2001
- *Affected Property Assessment Report Addendum and Response Action Plan*, dated February 21, 2003
- *Quarterly Groundwater Monitoring Report (April 1-June 30, 2004)*, dated October 5, 2004
- *Quarterly Groundwater Monitoring Report (July 1-September 30, 2004)*, dated October 26, 2004
- *Soil Source Area Characterization Report*, dated January 24, 2005
- *Quarterly Groundwater Monitoring Report (October 1-December 31, 2004)*, dated January 24, 2005
- *Annual Groundwater Monitoring Report (April 2004 – March 2005)*, dated June 30, 2005
- *First Quarter Groundwater Monitoring Report (September 2005)*, dated September 27, 2005

- *Second Quarter Groundwater Monitoring Report*, dated January 11, 2006
- *Third Quarter Groundwater Monitoring Report*, dated May 11, 2006
- *Annual Groundwater Monitoring Report (July 2005 – May 2006)*, dated July 10, 2006

The following is a list of submittals by InControl Technologies:

- *September 2006 Groundwater Monitoring Report*, dated September 19, 2006
- *November 2006 Groundwater Monitoring Report*, dated February 7, 2007
- *February 2007 Groundwater Monitoring Report*, dated March 15, 2007
- *May 2007 Groundwater Monitoring Report*, dated August 20, 2007
- *August 2007 Groundwater Monitoring Report*, dated October 1, 2007.
- Various responses to TCEQ comment letters dated November 10, 2006, February 7, 2007, April 2, 2007 and May 10, 2007.

Item 15 – Public Drinking Water Supply

Drinking water for the subject property is provided by the City of Houston. A review of the City of Houston 2006 Drinking Water Quality Report indicates that, "Houston drinking water met or exceeded all Federal and State standards for safe drinking water." Therefore, the City of Houston water supply system satisfies the requirements of Chapter 341 of the Texas Health and Safety Code.

The City of Houston 2006 Drinking Water Quality Report and the online City of Houston GIMS database indicated that the City of Houston water supply system appeared to be capable of supplying drinking water to the surrounding properties within a ½-mile radius of the subject property.

Item 16 – Private Water Well Owners within Five Miles of Subject Property

Refer to **Appendix P** for the names and address of identified water well owners and notifications. Notifications have been sent to 516 private water well owners (not including wells owned/operated by a public utility or municipality).

Item 17 – Retail Public Utility Operating Groundwater Supply Well within Five Miles of Subject Property

The following retail public utilities operate at least one groundwater supply well within five miles of the subject property:

- City of Houston,
- City of Bellaire,
- Southwest Harris County MUD 1,
- Harris County WCID Fondren Road,
- Fort Bend County WCID 2,
- City of Southside Place, and
- City of West University Place.

The above mentioned have been provided notice as required by section 361.805 of the Texas Health and Safety Code.

Refer to **Appendix Q** for the Water Utility Database Report and notifications.

Item 18– Municipalities within One Half Mile of Subject Property

Not Applicable. There are no other municipalities within ½- mile of the subject site. Therefore, no notice has been provided.

Item 19 – Municipalities Operating Groundwater Supply Well within Five Miles of Subject Property

The following municipalities operate at least one groundwater supply well within five miles of the subject property:

- City of Houston,
- City of Bellaire,
- City of Southside Place, and
- City of West University Place.

The above mentioned have been provided notice as required by section 361.805 of the Texas Health and Safety Code.

Refer to **Appendix Q** for the Water Utility Database Report and notifications.

Item 20 – Real Property owners within 2,500 feet of Designated Property Boundary

Refer to **Appendix T** for a listing of real property owners within 2,500 feet of designated property boundary. Copies of mailing labels have also been included in **Appendix T**.

Item 21 – Statement Regarding Completeness of Information and Potential for Off-Site Impact

To the best of my knowledge and belief, based upon a review of all public and private records and other information sources available to me in the exercise of due diligence, the opinions stated and conclusions made in this application are supported by such information, and the technical and scientific information submitted with the application is true, accurate, and complete. Based on such review, the contaminants of concern from the sources on the designated property more likely than not do not exceed a non-ingestion protective concentration level on property beyond the boundaries of the designated property.

Michael F. Marcon, P.G.
President, Principal
InControl Technologies, Inc.

Signature: _____

Date: 1/24/08

Item 22 – Determination of off-site source

Not Applicable. The contaminants of concern from sources on the designated property do not exceed a non-ingestion protective concentration level beyond the boundary of the designated property.

Item 23 – Statement Regarding Accuracy of Information

I certify under penalty of law that this application and all attachments were prepared under my direction or supervision in a manner designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the persons responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Michael F. Marcon, P.G.
President, Principal
InControl Technologies, Inc.

Signature: _____

Date: 1/24/08

InControl Technologies, Inc.

08-04-30A09:48 RCVD

Item 24 – MSD Application submitted to TCEQ

A copy of the MSD application that was submitted to the TCEQ will be included as **Appendix X** once the City of Houston MSD application has been approved.

Item 25 – Signed Restrictive Covenant

The signed and notarized restrictive covenant on groundwater use at the site is pending approval of the MSD from the City of Houston. Once the MSD application is approved, a copy of the signed and notarized restrictive covenant will be included as **Appendix Y**.

Item 26 – Filing Fee

The initial filing fee of \$2,000 is attached.